

In the Matter of )  
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Thousand Block Number Pooling Administration ) CC Docket No. 99-  
200

NeuStar, Inc (NeuStar), in its role as the North American Numbering Plan Administrator (NANPA), submits the following reply comments to address certain issues raised by parties commenting on the Thousand-Block Pooling Administrator Technical Requirements Document (Requirements Document).<sup>1</sup> In the Public Notice, the FCC seeks comment on the technical requirements that will be used in preparing the solicitation for the National Thousand Block Pooling Administrator (PA) next term of administration.

<sup>1</sup> *FCC Seeks Comment on the Thousands-Block Pooling Administrator Technical Requirements*, Public Notice, CC Docket No. 99-200, DA 05-3102 (rel. Nov. 29, 2005, reissued Dec. 2, 2005) (Public Notice). The Thousand-Block Pooling Administrator Technical Requirements Document (July 27, 2005) (Requirements Document) is attached to the Public Notice.

<sup>2</sup> NeuStar was selected to serve as the NANPA and the PA by the FCC via the competitive bidding process and currently is serving in those capacities.

system [NAS], documentation and related personnel...prior to their submission of bids.”<sup>3</sup> Further, Telcordia requests “any PA submission with regard to an interface to NAS made by NeuStar be made available to all potential bidders in time for inclusion in their submissions.” Telcordia concludes that absent this access to NAS, NAS documentation and NAS personnel, “the bidding process will be fundamentally flawed, and the Commission, the industry, and the public will be denied the benefits of competitive bidding.”

Telcordia’s interpretation of the Requirements Document, as it relates to the NAS/PAS interface, is unmanageable and unnecessary. In fact, these obstacles were anticipated and eliminated by the North American Numbering Council (NANC) in the drafting of the Requirements Document. Specifically, Section 3.1.5 of the Requirements Document states “The contractor will work with the NANPA to establish within six months from the beginning of the term of this contract, a functional mechanized interface between the two administration systems, PAS [Pooling Administration System] & CAS<sup>4</sup>, that allows for the passing of information between the two administration systems and where appropriate, from SPs [Service Providers] to the NANPA via the PA administration system and visa versa.” Clearly, in developing this

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<sup>3</sup> Comments of Telcordia Technologies, Inc. filed in the above-captioned docket on December 29, 2005, p. 2 (Telcordia Comments).

<sup>4</sup> As noted in NANPA’s previous comments, the reference to CAS (Code Administration System) should be changed to NAS (NANP Administration System).

NAS/PAS interface requirement, the NANC anticipated the issues raised by Telcordia by requiring the selected PA contractor to work with the NANPA in the design and implementation of an automated interface *after* selection by the FCC. Recognizing that there would be multiple vendors bidding on the PA contract, with differing technical solutions for the pooling administration system, it would be very difficult to identify and accurately cost the various technical interface alternatives that could be possible. Even if such an attempt was made, the potential exists for any non-winning vendor to claim it was not afforded sufficient access to all information, systems and/or personnel that resulted in it submitting the non-winning proposal.

As noted in NANPA's comments, the development and implementation of an interface between NAS and PAS will require a change order to the NANPA contract. Such a change order would only be submitted after NANPA had worked with the selected PA contractor on the design of the technical specifications for the automated interface. Once the NANPA change order was submitted, it would go through the current FCC change order review process, to include an examination and recommendation from the NANC, prior to FCC action. In compliance with Section 3.1.5, the selected PA also would submit its change order at the same or similar time frame, permitting the industry, NANC and the FCC the opportunity to review both change order submissions simultaneously, and thus ensure full compliance with the interface requirements as set forth in the Requirements

Document. This process avoids the need for prospective bidders to include the interface design and cost in their proposals, eliminating the need for access to NAS, NAS documentation and NANPA staff as described by Telcordia. It provides a level playing field in the bidding process, while affording the opportunity for full and complete industry analysis and acceptance of a NAS/PAS interface solution and associated cost after selection of the next PA.

In noting that a NANPA change order would be required to design and implement the NAS/PAS interface in our original comments, and that such work would take place after selection of the PA contractor, NANPA did not consider the potential impact on NANPA operations if it were required, prior to the submission of proposals by prospective bidders, to work with individual bidders on such an interface. If the FCC adopted such a process, an additional change order to the current NANPA contract would be needed. Further, established, well-defined parameters would be required from the FCC to ensure NANPA is not accused of inhibiting, misleading or in some fashion, advantaging or disadvantaging a particular bidder or bidders, either before, during or after the bidding process.

NeuStar, as the NANPA, respectfully submits these reply comments to the FCC for consideration in developing the Requirements Document for inclusion in the solicitation for the new Pooling Administrator.

Respectfully submitted,

/s/ John C. Manning

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Director, North American Numbering Plan  
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/s/ Kimberly Wheeler Miller

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